

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
ANN ARBOR DIVISION

WARNER BROS. RECORDS INC.,  
a Delaware corporation, et.al.

Plaintiffs,

ANNA DIGGS TAYLOR

v.

Civil Action No. 05-74394

LARRY SCANTLEBURY

Defendant.

LARRY SCANTLEBURY  
ProPer  
7049 Amberly Way  
Ypsilanti, MI 48197  
(734) 483-0063

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ANSWER

FIRST DEFENSE

1. The Defendant admits the allegations in Paragraph 1 of the Complaint.
2. The Defendant admits that this Court has In Personam 3. Jurisdiction over him but denies that the Court has jurisdiction pursuant to 28 U.S.C Sec. 1938 (a).
3. The Defendant admits the allegations in Paragraph 3 of the Complaint.

4. The Defendant admits the allegations in Paragraph 4 of the Complaint.
5. The Defendant admits the allegations in Paragraph 5 of the Complaint.
6. The Defendant admits the allegations in Paragraph 6 of the Complaint.
7. The Defendant admits the allegations in Paragraph 7 of the Complaint.
8. The Defendant admits the allegations in Paragraph 8 of the Complaint.
9. The Defendant admits the allegations in Paragraph 9 of the Complaint.
10. The Defendant admits the allegations in Paragraph 10 of the Complaint.
11. The Defendant admits the allegations in Paragraph 11 of the Complaint.
12. The Defendant repeats and realleges his responses to the allegations in Paragraphs 1 – 11 of the Complaint.
13. Defendant lacks sufficient knowledge to admit or deny the allegations contained in Paragraph 13 but leaves Plaintiffs to their proof.
14. Defendant lacks sufficient knowledge to admit or deny the allegations contained in Paragraph 13 but leaves Plaintiffs to their proof.

15. Defendant denies the allegations in Paragraph 15 of the Complaint.

16. Defendant lacks sufficient knowledge to admit or deny the allegations contained in Paragraph 15 but leaves Plaintiffs to their proof.

17. Defendant denies the allegations in Paragraph 17 of the Complaint.

18. Defendant denies the allegations in Paragraph 18 of the Complaint.

19. Defendant denies the allegations in Paragraph 19 of the Complaint.

#### **SECOND DEFENSE**

The Plaintiffs claim for relief fails to state a cause of action upon which relief can be granted because the Defendant has never performed, accomplished, executed or dispensed with any of the activities detailed in Paragraphs 15, 17 and 19.

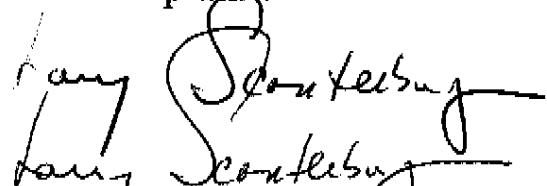
#### **THIRD DEFENSE**

Plaintiffs have violated the principles of ethics mandated by the Court and the State of Michigan by harassing the Defendant, telephoning him at his home, masquerading as 'settlement counselors,' adopting as actual aspects of the law never litigated or resolved by an Appellate Court and expressing those non resolved factors as established guidelines that this Court will follow. Plaintiffs pre-filing behavior urges sanctions and the only equitable sanction is dismissal of their Complaint.

WHEREFORE the Defendant requests that the Court dismiss Plaintiffs' Complaint and award to this Defendant costs and any other relief the Court finds equitable.

**DEMAND FOR JURY TRIAL**

Under Fed. R. Civ. Pro. 38 (b) (1), Defendant demands jury trial of all issues raised by Plaintiffs' Complaint.



LARRY SCANTLEBURY

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT ON THEIS DATE, March \_\_\_\_\_, 2006, I mailed a copy of this pleading to the below listed attorneys by placing it with appropriate postage in the U.S. Postal Office in Ypsilanti, Michigan, and mailing it to:

MATTHEW E. KRICHBAUM  
Soble Rowe Krichbaum, LLP  
221 North Main Street, Suite 2001  
Ann Arbor, Michigan 48104

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Shook Hardy  
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